

**DECLARATION OF PETER A. LASERNA**

I, PETER A. LASERNA, do hereby declare and state as follows:

1. I am an Assistant United States Attorney (“AUSA”) practicing in the United States Attorney’s Office for the Eastern District of New York. I am the AUSA assigned to the enforcement of the collection of criminal monetary penalties imposed against the defendant in the case, United States of America v. Jordan Ross Belfort, CR-98-0859 (AMD) (Eastern District of New York) (the “EDNY case”).

2. I am competent to testify as to the following facts, which are either within my personal knowledge, or gained by reviewing the files in this case. When indicated, certain facts are also upon information and belief.

3. On November 13, 2017, a subpoena duces tecum was personally served on non-party witness, JB Global, Inc., a California entity. On November 17, 2017, subpoenas duces tecum were personally served on non-party witnesses, JB Global Holdings, LLC and Global Motivation, Inc., each of which are California entities. The subpoenas were personally served on Anne Koppe, an individual who is the registered agent for all of these three California entities. Anne Koppe is also an officer, director or principal for each of these three California entities. True and correct copies of the subpoenas served on these California entities are collectively attached hereto as **Exhibit 1**. True and correct copies of the affidavits of service pertaining to each of these subpoenas are collectively attached hereto as **Exhibit 2**.

4. On November 16, 2017, subpoenas duces tecum were personally served on non-party witnesses, JB Global Holdings, LLC, JB Global, Inc. and Global Motivation, Inc., each of which are Nevada entities. The subpoenas were personally served on Business Filings Incorporated, the registered agent for these three Nevada entities. True and correct copies of the subpoenas served on these Nevada entities are collectively attached hereto as **Exhibit 3**. True and correct copies of the affidavits of service pertaining to each of these subpoenas are collectively attached hereto as **Exhibit 4**.

1           5. All of the aforementioned subpoenas contain identical attachments,  
2 demanding the same documents from each of the California and Nevada entities.  
3 Compare Exhibit 1 and Exhibit 3.

4           6. Upon information and belief, during 2016, JB Global Holdings, LLC, JB  
5 Global, Inc. and Global Motivation, Inc. were dissolved or canceled as California entities  
6 and re-formed as Nevada entities, operating under the same names and with the same  
7 principals and officers. The government served subpoenas on the entities, care of their  
8 respective registered agents, in both California and Nevada, to avoid any potential claim  
9 that the California and Nevada entities of the same name are separate and maintain  
10 separate books, records and other financial documents. In this way, the government will  
11 ensure that all records from the California entities prior to their dissolution in 2016, and  
12 all records from the Nevada entities after their formation in 2016, are produced. For the  
13 purposes of this Declaration, the three entities, JB Global Holdings, LLC, JB Global,  
14 Inc. and Global Motivation, Inc., will hereinafter collectively be referred to as “the non-  
15 party witnesses.”

16           7. The subpoenas were served on the non-party witnesses because Jordan  
17 Belfort, the debtor-defendant in the EDNY case, is an officer or director of each of the  
18 non-party witnesses and because he is the purported 50 percent owner of each of the  
19 non-party witnesses. The subpoenas were issued as part of the United States Attorney’s  
20 Office’s financial investigation of Belfort’s ability to pay the criminal monetary penalties  
21 imposed against him in the EDNY case. The non-party witnesses have information and  
22 documentation highly relevant to the potential claims and defenses in the EDNY case.

23           8. Pursuant to Fed. R. Civ. P. 45(a)(4), the undersigned caused to be mailed to  
24 Belfort’s attorney, by first class mail, a letter and a copy of the subpoenas (collectively,  
25 the “Rule 45 letter”) that were to be served upon the non-party witnesses. The Rule 45  
26 letter was mailed on or about November 7, 2017. On November 14, 2017, Belfort’s  
27 attorney acknowledged receiving the Rule 45 letter, but did not indicate that he would  
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1 object on behalf of the non-party witnesses or otherwise indicate he was representing the  
2 non-party witnesses.

3 9. Documents and information publically available on the websites for the  
4 Secretaries of State for California and Nevada show that Belfort is an officer, manager or  
5 director of all of the non-party witnesses. True and correct copies of the documents  
6 available on the website for the Secretary of State of California are collectively attached  
7 hereto as **Exhibit 5**. True and correct copies of the information available on the website  
8 for the Secretary of State of Nevada are collectively attached hereto as **Exhibit 6**.

9 10. The non-party witnesses' deadline to produce documents responsive to the  
10 subpoenas was Friday, December 1, 2017. The non-party witnesses failed to produce any  
11 documents in response to the subpoenas or respond to the subpoenas in any manner.

12 11. On December 20, 2017, I caused to be mailed, by U.S. Mail, a letter to each  
13 of the non-party witnesses, which letter (1) demanded that the non-party witnesses  
14 comply with the subpoenas and produce all documents responsive to the subpoena,  
15 without objection, by Friday, January 5, 2018, and (2) noted that they should have an  
16 authorized representative contact me, to the extent the non-party witnesses wished to  
17 discuss the subpoenas. True and correct copies of the letters sent to each of the non-party  
18 witnesses are collectively attached hereto as **Exhibit 7**.

19 12. As of the signing of this Declaration, the non-party witnesses have not  
20 responded to my December 20, 2017, letter.

21 13. On March 2, 2018, the U.S. Attorney's Office for the Eastern District of  
22 New York FedExed a letter to each of the California entities: JB Global, Inc., JB Global  
23 Holdings, LLC, and Global Motivation, Inc. The letter was sent to both (1) the registered  
24 agent for each entity that is noted on the website for the Secretary of State of California,  
25 and (2) the "Entity Mailing Address" for each entity that is noted on the website for the  
26 Secretary of State of California. The letter notes that the government must attempt in  
27 good faith to meet and confer with a representative from each of the entities prior to  
28 seeking a court order compelling compliance with the previously served subpoenas.

1 Through the letter, we requested that the entities either (1) produce all documents  
2 responsive to the subpoena, without objection, or (2) have an authorized representative  
3 of the entity contact the undersigned AUSA for a meet-and-confer, by the close of  
4 business on Thursday, March 8, 2018. True and correct copies of the letters sent to each  
5 of the non-party witnesses in California are collectively attached hereto as **Exhibit 8**.

6 14. On March 2, 2018, the U.S. Attorney's Office for the Eastern District of  
7 New York FedExed a letter to each of the Nevada entities: JB Global, Inc., and Global  
8 Motivation, Inc. The letter was sent to both (1) the registered agent for each entity that is  
9 noted on the website for the Secretary of State of Nevada, and (2) the mailing address of  
10 the officers for each entity that is noted on the website for the Secretary of State of  
11 Nevada. The letter was also sent to JB Global Holdings, LLC. The letter to JB Global  
12 Holdings, LLC's registered agent was also FedExed. However, the letter to the mailing  
13 address for JB Global Holding LLC was sent by U.S. Mail, because the address is a PO  
14 Box. FedEx does not deliver to PO Boxes. The letter that was sent by regular mail to JB  
15 Global Holdings, LLC, was marked "return to sender," returned to the government, and  
16 received by the U.S. Attorney's Office on or about March 13, 2018.

17 15. The March 2, 2018, letter sent to the Nevada entities notes that the  
18 government must attempt in good faith to meet and confer with a representative from  
19 each of the entities prior to seeking a court order compelling compliance with the  
20 previously served subpoenas. Through the letter, we requested that the entities either (1)  
21 produce all documents responsive to the subpoena, without objection, or (2) have an  
22 authorized representative of the entity contact the undersigned AUSA for a meet-and-  
23 confer, by the close of business on Thursday, March 8, 2018. True and correct copies of  
24 the letters sent to each of the non-party witnesses in Nevada are collectively attached  
25 hereto as **Exhibit 9**.

26 16. As of the signing of this Declaration, the non-party witnesses, either in  
27 California or Nevada, have not responded to my March 2, 2018, letter.

1           17. To date, the non-party witnesses have not responded to this office's letters  
2 or otherwise communicated with the undersigned about the subpoenas. The website for  
3 the pertinent Secretary of State contains no telephone number for the non-party  
4 witnesses or their registered agents. The non-party witnesses have not communicated to  
5 the undersigned that they have an attorney with whom we might meet and confer  
6 regarding the non-party witnesses' failure to respond to the subpoenas.

7           18. I have attempted to comply with the obligation to meet-and-confer with the  
8 non-party witnesses, as set forth above. However, the non-party witnesses have never  
9 responded to the subpoenas or the follow-up letters sent by this office.

10           19. Moreover, Belfort, who is a principal of the non-party witnesses, is aware of  
11 the subpoenas, as his attorney was provided notice of and copies of the subpoenas on  
12 November 7, 2017.

13           20. It appears that the non-party witnesses, and their officers and directors, are  
14 aware of the subpoenas and are deliberately ignoring their obligation to respond to the  
15 subpoenas. The government has made a good-faith effort to meet and confer with the  
16 non-party witnesses, which effort has been unsuccessful. Accordingly, a motion to  
17 compel compliance with the subpoenas will be filed without a meet-and-confer having  
18 taken place.

19           21. The government will file motions in the District Courts for the Central  
20 District of California and the District of Nevada to compel the non-party witnesses to  
21 comply with the subpoenas duces tecum served on them and also to transfer the  
22 subpoena related motion to the Eastern District of New York. The instant Declaration is  
23 submitted in support of the motions.

24           I declare under penalty of perjury that the foregoing is true and correct.

25           Executed on March 22, 2018, at Brooklyn, New York.

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PETER A. LASERNA